

Wm Branch Plaintiff : Civil action No. 1:00-cv-1728
vs. : (Judge Conner)
MR Russian Defendant :

Brief in Support of Motion to
order Defendants to Discovery and find them
in contempt

If it please's this most Honorable court, inmate
Wm Branch CF3756 has in Good faith per Rule of Federal
Civil Procedure 33. interrogatories to Parties for the
purpose of Discovery. this was done per court order
Dated 2-19-04 by the august Judge CONNER.

inclosed Please find:

- ① Certified mail Receipts Dated 3-19-04 addressed to ms Mosley # 1002-1000-0005-3999-2764 also a ~~cash~~ cash slip for \$4.88 SIGN. RETURN
- ② cash slip Dated 3-10-04 \$4.40 asking for mail confirmation To ms Mosley # 0304-7990-0001-5529-9140 Postil internet # call 1-800-222-1811 also a Request slip to the mail Room asking why it cost so much and her Reply that the letter was sent out PRIORITY mail ~~as~~ instead of standard mail as I had checked, (I have not Received Back the Post Date Receipt)
- ③ a letter Sent to ms Mosley esq Dated 3-1-04 asking her to meet with me and ~~informing~~ informing about Mr Friedman and G/o Gowat and asking her to agree to allow supplemental Pleading also her response letter Dated 3-17-04 I Received 3-19-04 acknowledging she Received that Letter and that she did not have the interrogatories

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Motion to ORDER Defendant to Discovery

Please note above the cash slips and the request slip from the mail room at #② Dealing with confirmation of delivery that went out on the 10th of March as stated by ms. Rollison as PRIORITY MAIL and the cash slip states that it was the interrogatories, but ms Mosley says on the 17th she never received that priority package, either ms Mosley is lying OR the mail room charged me \$4.40 and did not post my package, this shows a conspiracy by the staff to hinder my access to the courts and ms Mosley playing tricks with your court order at any time ms Mosley could pick up her telephone and call this prison and have them facts her my interrogatories if they need to I could have been called down and they could have used my copy!

There is no reason for ms Mosley esq failing to supply me with my interrogatories and violating your most judicial court order, and in light of the fact that I have ~~been~~ been trying for over 2 yrs to get discovery and your Honor changing your most reverent order and granting this humble inmate's prayer of discovery the defendants actions fly in the face of this most dignified Tribune.

Therefore I pray that a order of default and a fine of \$10,000 will be levied on these defendants and that they compelled to answer my interrogatories respectfully. Also speaking on my motion for injunctive relief, Sir the prison has given me back the job ms Surace fired me from, but I have not earned a bonus nor have I been working regular, when inmates who

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Started after me have been working and have earned the Baunce of 70¢ per hr. while I was only paid the Base pay of 19¢ per hr. (although I was Paid for each Day they sent me back) I was still one of the last ones to Return to work Please keep in mind I am and experinced WORKER (I worked in the Garment Plant Before and I was not fired for Bad WORKER but for accessing the courts).

~~Friday~~ friday I fell asleep durning Lunch Break and did not RETURN TO WORK, upon my RETURN TO WORK I was Confronted by a Muslim inmate who stated I do not appreicate your playing with my Religion. I asked him what are you talking about he said you told ms Dippel you were going to Jumah; I said "I never told ms Dippel that". Now why would this inmate be asking me this. When did the staff begin to use inmates to verify the whereabouts of other inmate. This is an attack on my Religious Belief and an attempt to get me Beat up see Exhibit R-2 + R-2 # 295183 misconduct. I affirm under Penalty of the law I never told ms Dippel I was going to Jumah. William Branch CF3756

I Believe that Ms SURACE is in Conspiracy with Ms Dippel To Create problems for me with the Muslim Community also Ms Dippel wrote me up charging me with lying to an Employee although this is not a misconduct, it went to Informal Resolution I was put on 7 days Cell Restriction based on a Lie. Please Help me

I affirm under Penalty of the Law that the above is TRUE
unsubstantiated Declaration
PROOF OF SERVICE

Ms Mosley eaq S.D.A.C. 15th floor STRAWBERRY Sq Harrisburg Pa. 17120
Date 3-25-04 William Branch CF3756 Po Box 256
Wayneart Pa. 18472